



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR
MIKE D. McDANIEL, Ph.D.
SECRETARY

Certified Mail No.:

Agency Interest No. 2367
Activity No.: PER20060002

Robert Slaven
Plant Manager
Syngenta Crop Protection, Inc.
Post Office Box 11
St. Gabriel, LA 70776

RE: Part 70 Operating Permit Modification, Herbicide Production Facility, Syngenta Crop Protection, Inc., St. Gabriel, Iberville Parish, Louisiana

Dear Mr. Slaven:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11th of August, 2010, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2006.

Permit No.: 2904-V1

Sincerely,

Public Notice

Lynn Carr Brown, Ph.D.
Assistant Secretary

CCB:FJH
cc: EPA Region VI

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313
P:225-219-3181 F:225-219-3309
WWW.DEQ.LOUISIANA.GOV

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SYNGENTA CROP PROTECTION, INC. / HERBICIDE PRODUCTION FACILITY (HPF)
PROPOSED PART 70 AIR OPERATING PERMIT MINOR MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Proposed Part 70 Air Operating Permit Minor Modification for Syngenta Crop Protection, Inc., P. O. Box 11, St. Gabriel, LA 70776 for the Herbicide Production Facility. **The facility is located at 3905 Hwy 75, St. Gabriel, Iberville Parish.**

Syngenta Crop Protection, Inc. requested a minor modification for the Part 70 air operating permit for its Herbicide Production Facility (HPF). The Herbicide Production Facility currently operates under Permit No. 2904-V0 issued on April 30, 2001, Permit No. 2807-V0 issued February 2, 2006.

The proposed minor modification is to divert the stream through the caustic scrubber (Emission Point 002) due to the Vent Gas Combustor (VGC) shut down. By doing so, overall emissions will be minimize as this stream removes the acid gases at a high efficiency. However, the scrubber has a low removal efficiency of CCl₄ and chloroform. Downtime of the VGC is generally due to safety interlocks which could result in severe damage to the VGC or a hazardous situation for the Herbicide Production Facility if the stream is not diverted.

Due to the increase in carbon tetrachloride (0.24 tons/yr) which is above the Minimum Emission Rate (MER), it is required to public notice this document.

Estimated emissions in tons per year are as follows:

Pollutant	Emissions		
	Before	After	Change
PM ₁₀	14.71	14.70	- 0.01
SO ₂	0.20	0.20	-
NO _x	55.95	55.96	+ 0.01
CO	59.13	59.13	-
VOC	276.28	276.86	+ 0.58

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, July 20, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The proposed minor modification permit and permit application is available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be reviewed at the Iberville Parish Library - East Iberville Branch located at 5715 Monticello Street, St. Gabriel LA 70776.

Inquiries or requests for additional information regarding this permit action should be directed to Mr. Fritz J. Hurst , LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3128.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at maillistrequest@ldeq.org or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/ and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 2367, Permit Number 2904-V1, and Activity Number PER20060002.

Publication Date: Thursday, June 15, 2006.

AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
AGENCY INTEREST NO.: 2367
SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

I. Background

Syngenta Crop Protection - St. Gabriel Plant manufactures and formulates pesticides and specialty chemicals. The plant is located on River Road (LA. 75), approximately 0.5 miles south of the intersection of La. 74 and River Road in Iberville Parish. Syngenta took ownership from Novartis Crop Protection, Inc. in January 2001. The Herbicide Production Facility (HPF) currently operates under Permit No. 2904-V0 dated August 11, 2005.

This is the Part 70 operating permit for the Herbicide Production Facility only.

II. Origin

A permit application and Emission Inventory Questionnaire was submitted by Syngenta Crop Protection - St. Gabriel Plant on February 2, 2006 requesting a Part 70 permit modification.

III. Description

The Syngenta St. Gabriel Plant manufactures and formulates pesticides and specialty chemicals. Specific processes include: 1) manufacture, formulation, and packaging of s-triazine herbicides, 2) manufacture of hydrogen cyanide, a raw material, 3) manufacture, formulation, and packaging activities for various other pesticides, and specialty chemicals, and 4) supportive activities for the above which include effluent treatment systems, maintenance, utilities, analytical and quality control. Additionally, hazardous and non-hazardous solid waste streams are incinerated in the St. Gabriel Plant multi-purpose rotary kiln incinerator.

The Herbicide Production Facility (HPF) consists of two manufacturing units. The first unit (CC unit) manufactures cyanuric chloride (CC) from hydrogen cyanide (produced on-site) and chlorine (received via pipeline). The second unit (Trazine unit) reacts the cyanuric chloride with various amines, depending on the desired product, to produce the s-Triazine herbicides. This unit is also involved in grinding and formulation activities of finished and intermediate products.

In the CC unit, cyanogen chloride (CNCI) is first produced by the reaction of hydrogen cyanide (HCN) and chlorine (Cl_2). The CNCI is dried and sent to trimerizers containing activated carbon catalyst. In this step, the CNCI is trimerized to produce cyanuric chloride (CC). The CC vapors are condensed and separated from the remaining gases. The molten CC is dissolved in toluene and sent to storage. The remaining gases are absorbed in carbon tetrachloride (CCl_4). The Cl_2 and unreacted CNCI are stripped and returned to the process. The CC recovered from the remaining gases is transferred to toluene and sent to storage.

In the Triazine unit, CC/toluene solution is pumped to a series of reactors where CC is reacted with various amines and aqueous sodium hydroxide to produce the s-Triazine. The resulting mixture is either decanted and steam stripped or steam stripped without decanting, depending on

AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
AGENCY INTEREST NO.: 2367
SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

which product is being produced. After being stripped, the aqueous s-Triazine slurry is filtered and washed. The wet cake is formulated into either powder or liquid formulations. Powders are spray dried and ground. Liquids are ground, and then a final formulation is made. Products are then transferred to the packaging unit for final processing (if needed), packaging and shipping.

The proposed modification is to divert the stream through the caustic scrubber (Emission Point 002) due to the Vent Gas Combustor (VGC) shut down. By doing so, overall emissions will be minimize as this stream removes the acid gases at a high efficiency. However, the scrubber has a low removal efficiency of CCl₄ and chloroform. Downtime of the VGC is generally due to safety interlocks which could result in severe damage to the VGC or a hazardous situation for the Herbicide Production Facility if the stream is not diverted.

Due to the increase in carbon tetrachloride (0.55 tons/yr) which is above the Minimum Emission Rate (MER), public notice for this modification is required.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Emissions</u>		
	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	14.71	14.70	- 0.01
SO ₂	0.20	0.20	-
NO _x	55.95	55.96	+ 0.01
CO	59.13	59.13	-
VOC	276.28	276.86	+ 0.58

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Benzene	0.01	0.01	-
Bi-Phenyl	0.004	0.004	-
Carbon Tetrachloride	45.26	45.81	+ 0.55
Chloroform	0.05	0.05	-
Ethylene Glycol	0.03	0.03	-
Methanol	0.41	0.41	-
Toluene	190.93	190.93	-
Total	236.69	237.24	+ 0.55

**AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**HERBICIDE PRODUCTION FACILITY
AGENCY INTEREST NO.: 2367
SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA**

Other VOC (TPY):

Non-toxic VOC	39.62
---------------	-------

Non- VOC TAPs (TPY):

Chlorine	1.15
Hydrogen Cyanide	0.26
Hydrogen Chloride	2.92
Phosgene	0.03
Total	4.36

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and NESHAP. Prevention of Significant Deterioration does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

The HPF Unit is subject to 40 CFR 63, Subpart MMM – National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT).

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**HERBICIDE PRODUCTION FACILITY
AGENCY INTEREST NO.: 2367
SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA**

VI. Public Notice

This permit modification requires public notice as per LAC 33:III.5107.D.1.a. A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, on May XX, 2006, and in the Plaquemine Post/South, Plaquemine, on May XX, 2006, and submitted to the Iberville Parish Library, East Iberville Branch, on May XX, 2006. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on May XX, 2006. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
Not Applicable			

VIII. General Condition XVII Activities

Activity	Frequency	Pollutant	TPY
Formulation Additive Mixing (pregel)	365 hrs/yr	PM	Trace
Binder Handling System	100 hrs/yr	PM	Trace
Draining of Amine Water to Trench During Startup/Shutdown	18 times/yr @ 8 hrs /time	Toluene	<0.005
Draining the Primary and Secondary Strippers to the Ground at Startup	18 times/yr @12 hrs/time	Toluene	<0.005
Setting-up Equipment for Maintenance	180 days	Toluene	<0.0025
Decanting Vessels During Unit Outages	10 times/yr	Toluene	<0.005
Draining Vent Headers	NA	Toluene	<0.005
Acid Washing of the Thermal Oxidizer	1 time/wk	HCl	Trace

AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
AGENCY INTEREST NO.: 2367
SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

IX. Insignificant Activities:

<u>ID No.:</u>	<u>Description</u>	<u>Capacity</u>	<u>Citation</u>
-	Laboratory Hoods	NA	LAC 33:III.501.B.5.A.6
616-F	Pregel Storage Tank	200 gals	LAC 33:III.501.B.5.A.2
2141-F	Proxel Batch	30 gals	LAC 33:III.501.B.5.A.2
152-F	Pregel Mix Tank Relief	500 gals	LAC 33:III.501.B.5.A.3
175-F	Proxel Storage Tank	1,500 gals	LAC 33:III.501.B.5.A.3
606-F	Surfactant Blend Tank	10,000 gals	LAC 33:III.501.B.5.A.3
118-F	Coolant Oil Surge Drum (Mobiltherm 600)	8,000 gals	LAC 33:III.501.B.5.A.3
2625-F	Diesel No. 1 Tank for Emergency Generator	500 gals	LAC 33:III.501.B.5.A.3
2801-LF	Diescl Tank	400 gals	LAC 33:III.501.B.5.A.3
153-F	Decanter Solvent Purge	1,422 gals	LAC 33:III.501.B.5.A.3
125-FA	15% Caustic Dilute Storage	20,000 gals	LAC 33:III.501.B.5.B.40
2103-F	50% Caustic Storage Tank	21,000 gals	LAC 33:III.501.B.5.B.40
126-FA	Caustic Scrubber Tank	21,000 gals	LAC 33:III.501.B.5.B.40
126-FB	Caustic Scrubber Tank	21,000 gals	LAC 33:III.501.B.5.B.40
128-FA	Caustic Scrubber Tank	12,000 gals	LAC 33:III.501.B.5.B.40
128-FB	Caustic Scrubber Tank	12,000 gals	LAC 33:III.501.B.5.B.40
187-F	Ammonia Soap	500 gals	LAC 33:III.501.B.5.A.3
619-F	Surge Filter Cloth Wash Water	750 gals	LAC 33:III.501.B.5.A.3
628-F	98% Acid Filter Wash for 601-FA/FB	1,600 gals	LAC 33:III.501.B.5.A.3
120-F	Primary Brine Surge Tank	20,000 gals	LAC 33:III.501.B.5.A.10
123-F	Secondary Brine Surge Tank	25,000 gals	LAC 33:III.501.B.5.A.10
129-F	Brine Make-Up Tank	500 gals	LAC 33:III.501.B.5.A.10
2109-F	Wetting Agent Storage Drum	25,000 gals	LAC 33:III.501.B.5.A.10
2133-F	Pre-Treatment Mixing	5,580 gals	LAC 33:III.501.B.5.A.3
149-F	Condensate Collection Tank	8,500 gals	LAC 33:III.501.B.5.A.3
601-F	Sluice Water Tank	5,000 gals	LAC 33:III.501.B.5.A.3
602-F	South Slurry Mix Tank	5,000 gals	LAC 33:III.501.B.5.A.3
602-FA	North Slurry Mix Tank	5,000 gals	LAC 33:III.501.B.5.A.3
620-F	Spray Dryer Feed Tank	3,000 gals	LAC 33:III.501.B.5.A.3
635-F	Cowles Mix Tank	800 gals	LAC 33:III.501.B.5.A.3
2140-F	Proxel Storage Tank	6,000 gals	LAC 33:III.501.B.5.A.3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter										51*	52	56	59
		5▲	9	11	13	15	2103	2113	2115	2122	22				
GRD027	Herbicide Production Facility	1	1	1	1	1	1	1	1	1	1				
EQT33	001: Spray Dryer	1	1	2				3							
EQT34	002: CC Vent to Scrubber	1	1	2				3							
EQT35	002b: CC Vent to Combustor	1	1	2				3							
EQT36	003: Grinder Discharge Vents (2)	1	1	2				3							
EQT37	010: Dowtherm Heater	1	1	2				3							
EQT38	011: HCN Drop Tanks Flare	1	1	2				2							
EQT39	012: Vacuum Vents	1	1	2				3							
EQT40	013: Filter Vent Exhaust	1	1	2				2							
EQT42	2110-F: Dispersion Agent Storage	1	1	2				3							
EQT43	2112-F: Princep Master Batch	1	1	2				2							
EQT44	119-F: Dowtherm Blowdown Drum	1	1	2				2							
EQT45	2117-FA: Toxicul Storage	1	1	2				2							
EQT46	2119-F: Ethylene Glycol Storage	1	1	2				2							
EQT47	2120-F: Renex Storage	1	1	2				2							
EQT48	1-03: Thermal Oxidizer	1	1	2				2							
EQT58	4-91: CATV System	1	1	2				2							
FUG3	HFFUG: Fugitive Emissions	1	1	2				2							
EQT50^	105-F:Dissolver Tank	1	1	2				2							
EQT51^	132-FA:South Stripper Feed Tank	1	1	2				2							
EQT52^	132-FB:North Stripper Feed Tank	1	1	2				2							
EQT53^	133-F:Toluene/Water Separator	1	1	2				2							
EQT54^	134-F:Topping Still Drum	1	1	2				2							

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33.III.Chapter										51*	52	56	59
		5▲	9	11	13	15	2103	2113	2115	2122	22	29			
EQT61^	136-F: Toluene Storage							1							
EQT62^	140-F: Toluene Storage							1							1
EQT55^	156-F: Vent Relief Tank														1
EQT56^	168-F: Multi-Stage Decanter														1
EQT72^	2414-F: Triazine Effluent Surge Tank							3							1
EQT59^	130-FA: CC/Toluene Storage Tank								1						1
EQT60^	130-FB: CC/Toluene Storage Tank								1						1
EQT70	113-F: Carbon Tetrachloride Storage														
EQT71	131-F: Carbon Tetrachloride Storage Tank														

* The regulations indicated above are State Only regulations.

▲ All LAC 33.III Chapter 5 citations are federally enforceable including LAC 33.III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

^ Vent to the atmosphere 240 hours/year. All other times vent to the thermal oxidizer (EQT48).

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
 AGENCY INTEREST NO.: 2367
 SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
 ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63						40 CFR	40 CFR
		A	VV	Dc	Kb	III	NNN	RRR	A	M	A	I	F,G,H	NNNN	MMM	68	82				
GRP027	Herbicide Production Facility	1				3	2	3	1	1	1	3	3	3	1	1	1				
EQT33	001: Spray Dryer																	2			
EQT34	002: CC Vent to Scrubber																	1			
EQT35	002b: CC Vent to Combustor																	1			
EQT36	003: Grinder Discharge Vents (2)																				
EQT37	010: Downterm Heater					2															
EQT38	011: HCN Drop Tanks Flare																1				
EQT39	012: Vacuum Vents																1				
EQT40	013: Filter Vent Exhaust																2				
EQT42	2110-F: Dispersion Agent Storage																				
EQT43	2112-F: Princep Master Batch					3															
EQT44	119-F: Dowtherm Blowdown Drum																				
EQT45	2117-FA: Toximul Storage					3															
EQT46	2119-F: Ethylene Glycol Storage					3											2				
EQT47	2120-F: Renex Storage					3												1			
EQT48	1-03: Thermal Oxidizer																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63						40 CFR	
		A	VV	Dc	Kb	III	NNN	RRR	A	M	A	I	F,G,H	NNNN	MMM	68	82	40 CFR	40 CFR		
EQT58	4-91: CATV System																				
FUG3	HPFFUG: Fugitive Emissions																				
EQT50^	105-F:Dissolver Tank																				
EQT51^	132-FA:South Stripper Feed Tank																				
EQT52^	132-FB:North Stripper Feed Tank																				
EQT53^	133-F:Toluene/Water Separator																				
EQT54^	134-F:Topping Still Drum																				
EQT61^	136-F:Toluene Storage																				
EQT62^	140-F:Toluene Storage																				
EQT55^	156-F:Vent Relief Tank																				
EQT56^	168-F:Multi-Stage Decanter																				
EQT72	2414-F:Surge Triazine Effluent Surge Tank																				
EQT59^	130-FA: CC/Toluene Storage Tank																				
EQT60^	130-FB: CC/Toluene Storage Tank																				
EQT70	113-F:Carbon Tetrachloride Storage																				
EQT71	131-F:Carbon Tetrachloride Storage Tank																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

**SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA**

[^]Vent to the atmosphere 240 hours/year. All other times vent to the thermal oxidizer (EQT48).

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
 AGENCY INTEREST NO.: 2367
 SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
 ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
Herbicide Production Facility	VOC Emissions from SOCMI Air Oxidation Units [40 CFR 60 Subpart III]	DOES NOT APPLY. This facility does not contain air oxidation processes. Facility was constructed prior to 10/21/83.
	VOC Emissions from SOMI Distillation Processes [40 CFR 60 Subpart NNN]	EXEMPT. Unit has not been modified or reconstructed since 12/30/83.
	VOC Emissions from SOCMI Reactor Processes [40 CFR 60 Subpart RRR]	DOES NOT APPLY. This unit was constructed prior to 6/29/90, and has not been reconstructed or modified after 6/29/90.
	Hazardous Organic NESHAAPS [40 CFR 63 Subpart F, G, and H]	DOES NOT APPLY. This unit does not produce any of the products listed in Table 1 of 40 CFR 63 Subpart F.
	Equipment Leaks for Certain Processes [40 CFR 63 Subpart I]	DOES NOT APPLY. This unit does not produce any of the products listed in 63.190.b.1 through 63.190.b.6.
	NESHAPS Hydrochloric Acid Production [40 CFR 63 Subpart NNNNN]	DOES NOT APPLY. In accordance with 63.8985(b)(3), a facility that is subject to 40 CFR 63 Subpart MMM is not subject to this subpart.
	Ozone Depleting Substances – Production and Consumption Controls [40 CFR 82 Subpart A]	DOES NOT APPLY. The HPF does not meet the definition of “production”.
	Emission Standards of Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. SO ₂ < 100 TPY. Burns natural gas.
	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. This stream is not considered a waste gas.
	NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM]	EXEMPT. Organic concentration is less than 20 ppmv.
EQT33 001:Spray Dryer	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. No waste gas stream containing volatile organic compounds vent to this device.
	Emission Standards of Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. SO ₂ < 100 TPY.
	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. No waste gas stream containing volatile organic compounds vent to this device.
EQT34 002:CC Vent to Scrubber		
EQT35 002b: CC Vent to Combustor		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY
 AGENCY INTEREST NO.: 2367
 SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
 ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT37 010:Dowtherm Heater	Emission Standards of Sulfur Dioxide [LAC 33:III.1503] Control of Emissions of Nitrogen Oxide [LAC 33:III.2201] Industrial Steam Generating Units [NSPS Subpart Dc]	EXEMPT. SO ₂ < 100 TPY. Burns natural gas. EXEMPT. This heater has a maximum rated capacity of less than 80 MM BTU/hr. EXEMPT. This unit was constructed prior to June 9, 1989.
EQT38 011:HCN Drop Tanks Flare	Emission Standards of Sulfur Dioxide [LAC 33:III.1503] Waste Gas Disposal [LAC 33:III.2115]	EXEMPT. SO ₂ < 100 TPY. Burns natural gas.
EQT40 013:Filter Vent Exhaust	NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM]	DOES NOT APPLY. HCN is not a hydrocarbon waste gas stream. EXEMPT. Organic concentration is less than 50 ppmv.
EQT59 130-FA:CC/Toluene Storage Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.
EQT60 130-FB:CC/Toluene Storage Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.
EQT61 136-F: Toluene Storage Tank	Storage of Volatile Organic Compounds [LAC 33:III.2103] Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	EXEMPT. Vapor pressure is less than 1.5 psia. Emissions are controlled by the Carbon Adsorption Toluene Vent (CATV) System. DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC - ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT62 140-F: Toluene Storage Tank	Storage of Volatile Organic Compounds [LAC 33:III.2103]	EXEMPT. Vapor pressure is less than 1.5 psia. Emissions are controlled by the Carbon Adsorption Toluene Vent (CATV) System.
	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	EXEMPT. Exempt from the requirements of Subpart Kb, per 40 CFR 63.1360(i)(3).
EQT71 131-F: Carbon Tetrachloride Storage Tank	NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM]	EXEMPT. Group II Storage Tank which is exempted from any control requirements.
	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. Tank storage capacity is less than 40 m ³ (10,566 gallons).
	Storage of Volatile Organic Compounds [LAC 33:III.2103]	EXEMPT. Vapor pressure is less than 1.5 psia.
EQT46 2119-F: Ethylene Glycol Storage Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.
	NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM]	EXEMPT. Group II Storage Tank which is exempt from any control requirements.
	Storage of Volatile Organic Compounds [LAC 33:III.2103]	EXEMPT. Vapor pressure is less than 1.5 psia.
EQT43 2112-F: Princep Master Batch	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. Tank storage capacity is less than 75 m ³ (19,813 gallons).
	NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM]	EXEMPT. Group II Storage Tank which is exempt from any control requirements.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

**SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA**

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT70 113-F:Carbon Tetrachloride Storage	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb] NESHAPS Pesticide Active Ingredient Production [40 CFR 63 Subpart MMM] Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Tank storage capacity is less than 40 m ³ (10,566 gallons).
EQT72 2414-F:Triazine Effluent Surge Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	EXEMPT. Group II Storage Tank which is exempt from any control requirements.
EQT42 2110-F:Dispersion Agent Storage	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. This is not a storage vessel.
EQT45 2117-F:Toximul Storage Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	EXEMPT. Vapor pressure is less than 1.5 psia.
EQT47 2120-F:Renex Storage	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.
	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	EXEMPT. Vapor pressure is less than 1.5 psia.
	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60 Subpart Kb]	DOES NOT APPLY. This vessel was constructed prior to July 23, 1984.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT48 1-03: Thermal Oxidizer	Emission Standards of Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. SO ₂ < 100 TPY. Recordkeeping and reporting requirements are required.
	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT. PAI MACT requires controls that reduce VOC's to a more stringent standard.
EQT36 003: Grinder Discharge Vents (2)	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. No waste gas stream containing volatile organic compounds vent to this device.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit.

SPECIFIC CONDITIONS

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

1. Permittee shall comply with a streamlined equipment leak monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the fugitive emission monitoring programs being streamlined, as indicated in the following table. Non-compliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.
 - i) Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LAC 33:III.Chapter 51) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamline program will include any exemptions based on size of component available in any of the programs being streamlined.
 - ii) Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
 - iii) Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on January 31 and July 31, to cover the periods July 1 through December 31 and January 1 through June 30, respectively. The semiannual reports shall include any monitoring performed within the reporting periods.
 - iv) The facility shall comply with the requirements of the Louisiana MACT Determination for Refinery Equipment Leaks (LDREL) dated July 26, 1994, except as noted below:
 - A. A connector is in VOTAP service if a piece of equipment that either contains or contacts a volatile fluid (liquid or gas) that is at least 5% of the sum of all Class I and II organic toxic air pollutants.
 - B. Connectors that are determined to be leaking by visual, audible, olfactory, or any other detection method shall be monitored, repaired, recorded, and reported according to the provisions in the Louisiana Refinery Equipment Leaks Determination and any applicable equipment leak programs.

SPECIFIC CONDITIONS

HERBICIDE PRODUCTION FACILITY

AGENCY INTEREST NO.: 2367

SYNGENTA CROP PROTECTION, INC – ST. GABRIEL PLANT
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA

- C. Connectors associated with valves shall be monitored according to the valve requirements of the applicable program. However, each associated connector shall be monitored as part of the valve and not as separate component. A connector that is associated with a valve and is determined to be leaking shall result in the valve being recorded as a leaking valve and included in the calculation of percent valves leaking.
- D. Permittee shall submit to the Office of Environmental Assessment, Environmental Technology Division reports containing information concerning valves. ConocoPhillips shall include on these reports the number of connectors associated with the valves that were monitored and the number of connectors found leaking, but shall not report a percent connectors leaking.

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Herbicide Production Facility	40 CFR 63 Subparts MMM – National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production	≥10% VOC	40 CFR 63 Subparts MMM – National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production
	LAC 33:III.2122-Louisiana Fugitive Emission Control for Specified Parishes	≥10% VOC	
	LAC 33:III.5109 – Louisiana MACT Determination for Non-HON Sources	≥5% VOTAP	

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (ii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

40 CFR PART 70 GENERAL CONDITIONS

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 - 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 - 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 - 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
 - 1. the date, place as defined in the permit, and time of sampling or measurements;
 - 2. the date(s) analyses were performed;
 - 3. the company or entity that performed the analyses;
 - 4. the analytical techniques or methods used;
 - 5. the results of such analyses; and
 - 6. the operating conditions as existing at the time of sampling or measurement.
[Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

40 CFR PART 70 GENERAL CONDITIONS

- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

40 CFR PART 70 GENERAL CONDITIONS

- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT

GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated February 2, 2005.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
2. Report by September 30 to cover April through June
3. Report by December 31 to cover July through September
4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 2367 Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	User Group	Start Date
	1280-00007	Syngenta Crop Protection Inc - St Gabriel Plant	CDS Number	04-04-1972
	1280-0007	Syngenta Crop Protection Inc - St Gabriel Plant	Emission Inventory	03-05-2004
LAD053783445		Syngenta Crop Protection Inc	Hazardous Waste Notification	08-18-1980
PMT/CA		GPR/A Baselines	Hazardous Waste Permitting	10-01-1997
LAD053783445		Ciba Geigy	Inactive & Abandoned Sites	11-23-1999
LA0005487		WPC File Number	LPDES Permit #	05-22-2003
LA0095478		WPC File Number	LPDES Permit #	05-22-2003
WP0956		WPC State Permit Number	LWDPS Permit #	06-25-2003
WP4554		WPC State Permit Number	LWDPS Permit #	06-25-2003
04042		LELAP #	Laboratory Services Division	10-17-2001
LA-2219-L-01		Radioactive Material License	Radiation License Number	12-08-2000
G-047-2031		Site ID #	Solid Waste Facility No.	11-21-1999
GPD-047-0107		Site ID #	Solid Waste Facility No.	08-13-2001
GPD-047-0224		Ciba-Geigy Corp	Solid Waste Facility No.	01-08-2002
16945		Ciba-Geigy Corp	TEMPO Merge	01-08-2001
24824		Syngenta Crop Protection Inc	TEMPO Merge	03-22-2001
31435		Novartis	TEMPO Merge	03-12-2001
38791		Novartis Crop Protection Inc	TEMPO Merge	02-04-2001
44118		Zeneca Ag Production Inc	TEMPO Merge	03-19-2001
45830		Zeneca Inc	TEMPO Merge	03-19-2001
48920		Ciba-Geigy Corp	TEMPO Merge	03-12-2001
75341		Ciba-Geigy Corp	TEMPO Merge	03-12-2001
96982		Ciba-Geigy Corp	TEMPO Merge	02-27-2002
1280-0007		Toxic Emissions Data Inventory #	Toxic Emissions Data Inventory #	01-01-1991
1280-0029		Toxic Emissions Data Inventory #	Toxic Emissions Data Inventory #	01-01-1993
70776CBGGYRIVER		TRI #	Toxic Release Inventory	07-08-2004
70776CMRCSHW75		UST Facility ID (from UST legacy data)	Underground Storage Tanks	07-09-2004
23002025		Water Permit #	Water Permitting	10-11-2002
729				11-21-1999

Physical Location:

3905 Hwy 75
St Gabriel, LA 70776

Main FAX:

2256421653
Main Phone:

2256421100

TPOR0148

Mailing Address:

PO Box 11

General Information

AI ID: 2367 Syngenta Crop Protection Inc - St Gabriel Plant
 Activity Number: PER20060002
 Permit Number: 2904-V1
Air - Title V Regular Permit Minor Mod

St Gabriel, LA 707760011

Location of Front Gate: 30° 14' 48" 22 hundredths latitude, 91° 6' 12" 63 hundredths longitude, Coordinate Method: GPS Code (Pseudo Range) Differential, Coordinate Datum: NAD83

Related People:	Name	Mailing Address	Phone (Type)	Relationship
Richard Boudreau		PO Box 11 St Gabriel, LA 707760011	2256421257 (WP)	Hazardous Waste Permit Contact For
Victor R. Cross		PO Box 11 St Gabriel, LA 707760011	2256421483 (WP)	Water Permit Contact For
Victor R. Cross		PO Box 11 St Gabriel, LA 707760011	2256421483 (WP)	Underground Storage Tank Contact for
Victor R. Cross		PO Box 11 St Gabriel, LA 707760011	2256421483 (WP)	Water Billing Party for
Mark Graham		PO Box 11 St Gabriel, LA 707760011	2256421794 (WF)	Radiation Safety Officer for
Mark Graham		PO Box 11 St Gabriel, LA 707760011	2253179150 (CP)	Radiation Safety Officer for
Mark Graham		PO Box 11 St Gabriel, LA 707760011	2256421686 (WP)	Radiation Safety Officer for
Bruce Raiff		PO Box 11 St Gabriel, LA 707760011	2256421686 (WP)	Air Permit Contact For
Bruce Raiff		PO Box 11 St Gabriel, LA 707760011	2256421686 (WP)	Accident Prevention Billing Party for
Bruce Raiff		PO Box 11 St Gabriel, LA 707760011	2256421686 (WP)	Accident Prevention Contact for
Related Organizations:	Name	Address	Phone (Type)	Relationship
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	Owns
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	Air Billing Party for
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	Operates
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	UST Billing Party for
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	Solid Waste Billing Party for
Syngenta Crop Protection Inc		PO Box 11 St Gabriel, LA 707760011	2256421100 (WP)	Radiation License Billing Party for
SIC Codes:		2819, Industrial inorganic chemicals, nec 2869, Industrial organic chemicals, nec 2879, Pesticides and agricultural chemicals, nec		

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant
 Activity Number: PER20060002
 Permit Number: 2904-V1
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory.

ID	Description	Tank Volume	Max Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT033	001: Spray Dryer		73 MM BTU/hr	73 MM BTU/hr		8064 hr/yr (All Year)
EQT034	002: CC Vent to Scrubber			4 MM BTU/hr		8760 hr/yr (All Year)
EQT035	002b: CC Vent to Combustor			4 MM BTU/hr		8760 hr/yr (All Year)
EQT036	003: Grinder Discharge Vents (2)			4 MM BTU/hr		8064 hr/yr (All Year)
EQT037	010: Dowtherm Heater		13 MM BTU/hr	13 MM BTU/hr		2016 hr/yr (All Year)
EQT038	011: HCN Drop Tanks Flare		1.27 MM BTU/hr	1.27 MM BTU/hr		8760 hr/yr (All Year)
EQT039	012: Vacuum Vents					8760 hr/yr (All Year)
EQT040	013: Filter Vent Exhaust					8064 hr/yr (All Year)
EQT042	2110-F: Dispersion Agent Storage	25000 gallons	2.5 MM gallons/yr	2.5 MM gallons/yr		8760 hr/yr (All Year)
EQT043	2112-F: Princep Master Batch	15000 gallons	300000 gallons/yr	300000 gallons/yr		8760 hr/yr (All Year)
EQT044	119-F: Dowtherm Blowdown Drum	18000 gallons	5140 gallons/yr	5140 gallons/yr		8760 hr/yr (All Year)
EQT045	2117-F: A Toximul Storage	30500 gallons	3.06 MM gallons/yr	3.06 MM gallons/yr		8760 hr/yr (All Year)
EQT046	2119-F: Ethylene Glycol Storage	20000 gallons	2 MM gallons/yr	2 MM gallons/yr		8760 hr/yr (All Year)
EQT047	2120-F: Renex Storage	20000 gallons	1.32 MM gallons/yr	1.32 MM gallons/yr		8760 hr/yr (All Year)
EQT048	1-03: Thermal Oxidizer		3.44 MM BTU/hr	3.44 MM BTU/hr		8760 hr/yr (All Year)
EQT050	105-F: Dissolver Tank	20000 gallons				8760 hr/yr (All Year)
EQT051	132-F: South Stripper Feed Tank	15000 gallons	456856 gallons/yr	456856 gallons/yr		8760 hr/yr (All Year)
EQT052	132-FB: North Stripper Feed Tank	15000 gallons	456856 gallons/yr	456856 gallons/yr		8760 hr/yr (All Year)
EQT053	133-F: Toluene/Water Separator	20000 gallons				8760 hr/yr (All Year)
EQT054	134-F: Topping Still Drum	1200 gallons				8760 hr/yr (All Year)
EQT055	156-F: Vent Relief Tank	3000 gallons				8760 hr/yr (All Year)
EQT056	168-F: Multi-Stage Decanter	16500 gallons				8760 hr/yr (All Year)
EQT058	4-91: CATV System					8760 hr/yr (All Year)
EQT059	130-F-A: CC/Toluene Storage Tank	500000 gallons	101.67 MM gallons/hr	101.67 MM gallons/yr		8760 hr/yr (All Year)
EQT060	130-FB: CC/Toluene Storage Tank	500000 gallons	101.67 MM gallons/yr	101.67 MM gallons/yr		8760 hr/yr (All Year)
EQT061	136-F: Toluene Storage	500000 gallons	101.67 MM gallons/yr	101.67 MM gallons/yr		8760 hr/yr (All Year)
EQT062	140-F: Toluene Storage	500000 gallons	101.67 MM gallons/hr	101.67 MM gallons/yr		8760 hr/yr (All Year)
EQT070	113-F: Carbon TetraChloride Storage Tank	6000 gallons				8760 hr/yr (All Year)
EQT071	131-F: Carbon TetraChloride Storage Tank	5000 gallons				8760 hr/yr (All Year)
EQT072	2414-F: Triazine Effluent Surge Tank	5500 gallons				8760 hr/yr (All Year)
EQT142	125-FB: Alrazone Sump Water Recycle Tank	20000 gallons				8760 hr/yr (All Year)
EQT143	617-F: Surge Trim Tank	50000 gallons				8760 hr/yr (All Year)
EQT144	618-F: Ball Mill Feed Tank	50000 gallons				8760 hr/yr (All Year)
EQT145	621-F: Liquid Triazine Feed Tank	50000 gallons				8760 hr/yr (All Year)
EQT146	631-F: Liquid Triazine Feed Tank	50000 gallons				8760 hr/yr (All Year)
EQT147	608-F: Assay Trim Tank	50000 gallons				8760 hr/yr (All Year)
EQT148	612-F: Liquid Triazine Receiver Tank	50000 gallons				8760 hr/yr (All Year)

INVENTORIES

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

Subject Item Inventory

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT149	615-F: Slurry Receiver Tank	50000 gallons				8760 hr/yr (All Year)
FUG003	HIPFFUG: Fugitive Emissions					8760 hr/yr (All Year)

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP021	Thermal Oxidizer Group	EQT39 012: Vacuum Vents
GRP021	Thermal Oxidizer Group	EQT50 105-F: Dissolver Tank
GRP021	Thermal Oxidizer Group	EQT51 132-F/A: South Stripper Feed Tank
GRP021	Thermal Oxidizer Group	EQT52 132-F/B: North Stripper Feed Tank
GRP021	Thermal Oxidizer Group	EQT56 168-F: Multi-Stage Decanter
GRP021	Thermal Oxidizer Group	GRP22 CATV System Group
GRP021	Thermal Oxidizer Group	EQT55 156-F: Vent Relief Tank
GRP021	Thermal Oxidizer Group	EQT54 134-F: Topping Still Drum
GRP021	Thermal Oxidizer Group	EQT53 133-F: Toluene/Water Separator
GRP022	CATV System Group	EQT59 130-F/A: CC/Toluene Storage Tank
GRP022	CATV System Group	EQT62 140-F: Toluene Storage
GRP022	CATV System Group	GRP21 Thermal Oxidizer Group
GRP022	CATV System Group	EQT60 130-F/B: CC/Toluene Storage Tank
GRP022	CATV System Group	EQT61 136-F: Toluene Storage
GRP023	During Shutdown Vents to Atmosphere	GRP21 Thermal Oxidizer Group
GRP023	During Shutdown Vents to Atmosphere	EQT33 001: Spray Dyer
GRP027	Herbicide Production F Facility	EQT34 002: CC Vent to Scrubber
GRP027	Herbicide Production F Facility	EQT35 002b: CC Vent to Combustor
GRP027	Herbicide Production F Facility	EQT36 003: Grinder Discharge Vents (2)
GRP027	Herbicide Production F Facility	EQT37 010: Dowtherm Heater
GRP027	Herbicide Production F Facility	EQT38 011: HCN Drop Tanks Flare
GRP027	Herbicide Production F Facility	EQT39 012: Vacuum Vents
GRP027	Herbicide Production F Facility	EQT40 013: Filter Vent Exhaust
GRP027	Herbicide Production F Facility	EQT42 2110-F: Dispersion Agent Storage
GRP027	Herbicide Production F Facility	EQT43 2112-F: Princep Master Batch
GRP027	Herbicide Production F Facility	EQT44 119-F: Dowtherm Blowdown Drum
GRP027	Herbicide Production F Facility	EQT45 2117-F/A: Toximul Storage
GRP027	Herbicide Production F Facility	EQT46 2119-F: Ethylene Glycol Storage
GRP027	Herbicide Production F Facility	EQT47 2120-F: Renex Storage
GRP027	Herbicide Production F Facility	EQT48 1-03: Thermal Oxidizer

INVENTORIES

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant
 Activity Number: PER20060002
 Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP027	Herbicide Production Facility	EQT50 105-F: Dissolver Tank
GRP027	Herbicide Production Facility	EQT51 132-F-A: South Stripper Feed Tank
GRP027	Herbicide Production Facility	EQT52 132-FB: North Stripper Feed Tank
GRP027	Herbicide Production Facility	EQT53 133-F: Toluene/Water Separator
GRP027	Herbicide Production Facility	EQT54 134-F: Topping Still Drum
GRP027	Herbicide Production Facility	EQT55 156-F: Vent Relief Tank
GRP027	Herbicide Production Facility	EQT56 168-F: Multi-Stage Decanter
GRP027	Herbicide Production Facility	EQT58 4-91: CATV System
GRP027	Herbicide Production Facility	EQT59 130-F-A: CC/Toluene Storage Tank
GRP027	Herbicide Production Facility	EQT60 130-FB: CC/Toluene Storage Tank
GRP027	Herbicide Production Facility	EQT61 136-F: Toluene Storage
GRP027	Herbicide Production Facility	EQT62 140-F: Toluene Storage
GRP027	Herbicide Production Facility	EQT70 113-F: Carbon TetraChloride Storage Tank
GRP027	Herbicide Production Facility	EQT71 131-F: Carbon TetraChloride Storage Tank
GRP027	Herbicide Production Facility	EQT72 241-F: Triazine Effluent Surge Tank
GRP027	Herbicide Production Facility	FUG3 HPFFUG: Fugitive Emissions
GRP027	Herbicide Production Facility	GRP21 Thermal Oxidizer Group
GRP027	Herbicide Production Facility	GRP22 CATV System Group
GRP027	Herbicide Production Facility	GRP23 During Shutdown Vents to Atmosphere

Relationships:

Subject Item	Relationship	Subject Item
EQT35 002b: CC Vent to Combustor	Vents to	EQT34 002: CC Vent to Scrubber
EQT70 113-F: Carbon TetraChloride Storage Tank	Vents to	EQT35 002b: CC Vent to Combustor
EQT71 131-F: Carbon TetraChloride Storage Tank	Vents to	EQT35 002b: CC Vent to Combustor
GRP21 Thermal Oxidizer Group	Vents to	EQT48 1-03: Thermal Oxidizer
GRP21 Thermal Oxidizer Group	Vents to	EQT58 4-91: CATV System
GRP22 CATV System Group	Vents to	EQT48 1-03: Thermal Oxidizer
GRP22 CATV System Group	Vents to	EQT58 4-91: CATV System

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
AI236	Herbicide Production Facility				96	128
EQT033	001: Spray Dryer	8.5	62000	12.5	125	125
EQT034	002: CC Vent to Scrubber	73	42000	3.5	130	130
EQT035	002b: CC Vent to Combustor	73	42000	3.5	130	130
EQT036	003: Grinder Discharge Vents (2)	3.9	14700	3	25	112

INVENTORIES

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant
 Activity Number: PER20060002
 Permit Number: 2904-V1
 Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT037 010: Dowtherm Heater	25	4850	.2		138	1250
EQT038 011: HCN Drop Tanks Flare	40	480	.5		130	1200
EQT039 012: Vacuum Vents	40	1070	.75		80	110
EQT040 013: Filter Vent Exhaust	39	22500	3.5		50	140
EQT044 119-F: Dowtherm Blowdown Drum			1.3		130	
EQT048 1-03: Thermal Oxidizer	31	4000	1.2		55	168
EQT058 4-91: CATV System	54	3415	1.2		60	85
EQT059 130-F: CC/Toluene Storage Tank			.5			

Fee Information:

Sub Item Id	Multiplier	Units Of Measure	Fee Desc
GRP027	1	Trains	0670 - Pesticides Manufacture

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

EQT033 001: Spray Dryer

- 1 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33.III.1305.1-7. [LAC 33:III.1.305]
- 2 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.131.C]

Which Months: All Year Statistical Basis: Six-minute average

3 Filter elements (bags): Equipment/operational data monitored by technically sound method once every six months or whenever visual checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None Specified

4 Filter elements (bags): Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

5 Particulate matter (10 microns or less) >= 98 % removal efficiency. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None Specified

6 Methanol and Benzene emissions are controlled by combustion (98% eff), which is determined as Maximum Achievable Control Technology (MACT). [LAC 33:III.5109.A]

EQT034 002: CC Vent to Scrubber

- 7 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 8 Emissions are controlled by a scrubber (98% eff), which is determined as Maximum Achievable Control Technology (MACT). Compliance Plan certified on March 20, 1995. [LAC 33:III.5109.A]
- 9 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retain records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 10 Shall control emissions of hazardous air pollutants to an efficiency 98% by weight or greater (NESHAPS Pesticide Active Ingredient Production - 40 CFR 63 Subpart MMM).
- 11 HCl and Cl₂ emissions, including HCl generated from combustion of halogenated process vent emissions, from the sum of all process vents within a process shall be reduced by 94 percent or greater or to outlet concentrations less than or equal to 20 ppmv (40 CFR 63 Subpart MMM - NESHAPS Pesticide Active Ingredient Production). [40 CFR 63.1362(b)(2)]
- 12 Flow rate recordkeeping by electronic or hard copy once every 15 minutes during the period in which the scrubber is controlling HAP emissions. [40 CFR 63.1362(b)(3)(ii)]
- 13 pH recordkeeping by electronic or hard copy daily. [40 CFR 63.1362(b)(3)(iii)]
- 14 pH monitored by grab sampling daily and percent caustic analysis must be performed daily to insure a percent caustic of greater than 3%. [40 CFR 63.1362(b)(3)(iv)]
- 15 Flow rate monitored by flow rate monitoring device once every 15 minutes. Maintain daily average liquid flow rate into the scrubber at least 486.1 gallons per minute. [40 CFR 63.1362(b)(3)(v)]

Which Months: All Year Statistical Basis: None Specified

EQT035 002b: CC Vent to Combustor

- 16 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant
Activity Number: PER20060002
Permit Number: 2904-Y1
Air - Title V Regular Permit Minor Mod

002b: CC Vent to Combustor

- 17 Emissions are controlled by a gas combustion (98% eff), which is determined as Maximum Achievable Control Technology (MACT). Compliance Plan certified on March 20, 1995. [LAC 33:III.5109.A]
- 18 HCl and Cl₂ emissions, including HCl generated from combustion of halogenated process vent emissions, from the sum of all process vents within a process shall be reduced by 94% or greater or to outlet concentrations less than or equal to 20 ppmv (40 CFR 63 Subpart MMM - NESHAPS Pesticide Active Ingredient Production). [40 CFR 63.1362(b)((3)(ii))]
- 19 Shall control emissions of organic hazardous air pollutants to an efficiency 98% by weight or greater (NESHAPS Pesticide Active Ingredient Production - 40 CFR 63 Subpart MMM). [40 CFR 63.1362(b)(2)]
- 20 pH monitored by pH instrument daily. [40 CFR 63. Subpart(MMM)]
Which Months: All Year Statistical Basis: None specified
- 21 Flow rate monitored by flow rate monitoring device once every 15 minutes during the period in which the scrubber is controlling HAP emissions. Maintain daily average liquid flow rate into the scrubber at least 47.7 GPM. [40 CFR 63. Subpart(MMM)]
Which Months: All Year Statistical Basis: None specified
- 22 pH recordkeeping by electronic or hard copy daily. [40 CFR 63. Subpart(MMM)]
- 23 Flow rate recordkeeping by electronic or hard copy once every 15 minutes. [40 CFR 63. Subpart(MMM)]
- 24 Temperature monitored by temperature monitoring device once every 15 minutes and maintain daily average temperature of the gases existing the combustion chamber at 1596 F or above. [40 CFR 63. Subpart(MMM)]
Which Months: All Year Statistical Basis: Annual maximum
- 25 Temperature recordkeeping by electronic or hard copy once every 15 minutes. [40 CFR 63. Subpart(MMM)]

003: Grinder Discharge Vents (2)

- 26 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
27 Total suspended particulate <= 21.06 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]
Which Months: All Year Statistical Basis: None specified

EQT036 010: Dowtherm Heater

- 28 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
Which Months: All Year Statistical Basis: None specified
- 29 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
30 Total suspended particulate <= 0.6 lb/MMBTU of heat input. [LAC 33:III.1313.C]
Which Months: All Year Statistical Basis: None specified

EQT038 011: HCN Drop Tanks Flare

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

EQT038 011: HCN Drop Tanks Flare

- 31 Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets. [LAC 33:III.1105]
Which Months: All Year Statistical Basis: None specified
- 32 Develop a corrective action plan for re-lighting the flare. Plan must be kept readily available for immediate implementation in the event the flare needs to be re-lit. [LAC 33:III.501.C.6]
- 33 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retain records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 34 Shall control emissions of organic hazardous air pollutants to an efficiency 98% by weight or greater (40 CFR 63 Subpart MMM - NESHAPS Pesticide Active Ingredient Production). [40 CFR 63.1362(b)(2)]
- 35 Presence of a flame monitored by heat sensing device once every 15 minutes. [40 CFR 63. Subpart(MMM)]
Which Months: All Year Statistical Basis: None specified
- 36 EPA Method 22 (visible opacity determination) testing was performed by METCO Environmental on March 25, 2004. The results of this test showed no visible emission over (6) twenty-minute observation periods. [40 CFR 63. Subpart(MMM)]
- 37 A waiver is approved for the performance testing regarding the heat content and velocity requirements as allowed per 40 CFR 63.7(h)(1). Compliance was demonstrated with these requirements using an engineering assessment. [40 CFR 63. Subpart(MMM)]
- 38 Presence of a flame recordkeeping by electronic or hard copy continuously. [40 CFR 63. Subpart(MMM)]

EQT039 012: Vacuum Vents

- 39 Shall control emissions of organic hazardous air pollutants to an efficiency 98% by weight or better. NESHAPS Pesticide Active Ingredient Production. [40 CFR 63.1362(b)(2)]

EQT040 013: Filter Vent Exhaust

- 40 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1.-7. [LAC 33:III.1305]

EQT043 2112-F: Princep Master Batch

- 41 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol is a Class III TAP; therefore, MACT is not required. [LAC 33:III.5109.A]
- 42 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Emits Class II TAP below the MER. No additional controls are considered MACT. [LAC 33:III.5109.A]

EQT044 2119-F: Dowtherm Blowdown Drum

- 43 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol is a Class III TAP; therefore, MACT is not required. [LAC 33:III.5109.A]
- 44 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol is a Class III TAP; therefore, MACT is not required. [LAC 33:III.5109.A]

EQT046 2119-F: Ethylene Glycol Storage

- 45 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol is a Class III TAP; therefore, MACT is not required. [LAC 33:III.5109.A]
- 46 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol is a Class III TAP; therefore, MACT is not required. [LAC 33:III.5109.A]

EQT048 1-03: Thermal Oxidizer

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant
 Activity Number: PER20060002
 Permit Number: 2904-V1
 Air - Title V Regular Permit Minor Mod

EQT048**1-03: Thermal Oxidizer**

- 44 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1.101.B]
 Which Months: All Year Statistical Basis: None specified
- 45 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1.13]
- 46 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Compliance Plan certified March 20, 1995. [LAC 33:III.5109.A]
- 47 Shall control emissions of hazardous air pollutants to an efficiency 98% by weight or greater. [40 CFR 63.Subpart(MMM)]
- 48 Temperature recorded at least every 15 minutes. [40 CFR 63.Subpart(MMM)]
- 49 pH recordkeeping by electronic or hard copy daily. [40 CFR 63.Subpart(MMM)]
- 50 Flow rate recordkeeping by electronic or hard copy once every 15 minutes during the period in which the scrubber is controlling HAP emissions. [40 CFR 63.Subpart(MMM)]
- 51 Flow rate monitored by flow rate monitoring device once every 15 minutes. Maintain daily average liquid flow rate into the scrubber at least 11.8 gallons per minute when controlling HAPs. [40 CFR 63.Subpart(MMM)]
 Which Months: All Year Statistical Basis: None specified
- 52 Temperature monitored by temperature monitoring device once every 15 minutes and maintain daily average temperature of the gases existing the combustion chamber at 1617 F or above. [40 CFR 63.Subpart(MMM)]
 Which Months: All Year Statistical Basis: Annual maximum
 53 pH monitored daily. [40 CFR 63.Subpart(MMM)]

EQT050**105-F: Dissolver Tank**

- 54 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
 55 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT051**132-FA: South Stripper Feed Tank**

- 56 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
 57 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT052**132-FB: North Stripper Feed Tank**

- 58 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
 59 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT053**133-F: Toluene/Water Separator**

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

133-F: Toluene/Water Separator

EQT053

- 60 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
- 61 A Group I storage vessel at an existing affected source shall be equipped with a closed vent system that reduces organic HAP emissions by 95% by weight or greater. Tank is controlled with Emission Point 4-91 (CATV) - NESHAPS Pesticide Active Ingredient Production -Storage Vessels. [40 CFR 63.1362(c)(2)(iv)(A)]

EQT054

134-F: Topping Still Drum

- 62 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
- 63 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT055

156-F: Vent Relief Tank

- 64 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
- 65 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT056

168-F: Multi-Stage Decanter

- 66 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. MACT is not required. Emits Class III TAP's. [LAC 33:III.5109.A]
- 67 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.Subpart(MMM)]

EQT058

4-91: CATV System

- 68 Control VOC emissions using activated carbon adsorption units (at 95% efficiency) that have been approved by the Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 69 Submit to DEQ a compliance plan for achieving compliance with MACT requirements in accordance with LAC 33:III.5109.D. Include the elements listed under LAC 33:III.5109.E. [LAC 33:III.5109.A.1]
- 70 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. MACT is not required. Emits class III TAPs. [LAC 33:III.5109.A]
- 71 Hours of downtime due to planned routine maintenance can not exceed 240 hours per year (unless an application to extend is submitted)(40 CFR 63 Subpart MMM). [40 CFR 63.1362(C)(5)]
- 72 Control storage vessels greater than 95% (40 CFR 63 Subpart MMM). [40 CFR 63.1362(c)(2)(iv)(A)]
- 73 Maintain average regeneration stream flow at or greater than 914 lb/hr for each regeneration cycle. [40 CFR 63.1368(h)(3)]
- 74 Bed must be heated to at least 90 degrees C during each regeneration cycle. [40 CFR 63.1368(h)(3)]
- 75 Bed must be cooled to at least 38 degrees C within 15 minutes of completing the cooling phase. [40 CFR 63.1368(h)(3)]
- 76 Regeneration frequency (time since the end of the last regeneration) can not exceed 10 hours. [40 CFR 63.1368(h)(3)]

EQT059

130-FA: CC/Toluene Storage Tank

- 77 VOL storage data recordkeeping by electronic or hard copy continuously. Keep records of the type(s) of VOC stored and the length of time stored. [LAC 33:III.2103.I.2.c]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

EQT059 130-F-A: CC/Toluene Storage Tank

78 Tank is equipped with a submerged fill pipe and is controlled by the Carbon Adsorption Toluene Vent (CATV) System and a condenser. [LAC 33:III.2103]

79 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAPs. [LAC 33:III.5109.A]

80 A Group 1 storage vessel at an existing affected source shall be equipped with a closed vent system that reduces organic HAP emissions by 95% by weight or greater. Tank is controlled with Emission Point 4-91 (CATV) - NESHAPS Pesticide Active Ingredient Production -Storage Vessels. [40 CFR 63.1362(c)(2)(iv)(A)]

EQT060 130-FB: CC/Toluene Storage Tank

81 VOL storage data recordkeeping by electronic or hard copy continuously. Keep records of the type(s) of VOC stored and the length of time stored. [LAC 33:III.2103.I.2.c]

82 Tank is equipped with a submerged fill pipe and is controlled by the Carbon Adsorption Toluene Vent (CATV) System and a condenser. [LAC 33:III.2103]

83 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Hydrochloric Acid and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33:III.5109.A]

84 A Group 1 storage vessel at an existing affected source shall be equipped with a closed vent system that reduces organic HAP emissions by 95% by weight or greater. Tank is controlled with Emission Point 4-91 (CATV) - NESHAPS Pesticide Active Ingredient Production -Storage Vessels. [40 CFR 63.1362(c)(2)(iv)(A)]

EQT061 136-F: Toluene Storage

85 VOL storage data recordkeeping by electronic or hard copy continuously. Keep records of the type(s) of VOC stored and the length of time stored. [LAC 33:III.2103.I.2.c]

86 Tank is equipped with a submerged fill pipe and is controlled by the Carbon Adsorption Toluene Vent (CATV) System and a condenser. [LAC 33:III.2103]

87 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAPs. [LAC 33:III.5109.A]

88 A Group 1 storage vessel at an existing affected source shall be equipped with a closed vent system that reduces organic HAP emissions by 95% by weight or greater. Tank is controlled with Emission Point 4-91 (CATV) - NESHAPS Pesticide Active Ingredient Production -Storage Vessels. [40 CFR 63.1362(c)(2)(iv)(A)]

EQT062 140-F: Toluene Storage

89 VOL storage data recordkeeping by electronic or hard copy continuously. Keep records of the type(s) of VOC stored and the length of time stored. [LAC 33:III.2103.I.2.c]

90 Tank is equipped with a submerged fill pipe and is controlled by the Carbon Adsorption Toluene Vent (CATV) System and a condenser. [LAC 33:III.2103]

91 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAPs. [LAC 33:III.5109.A]

92 A Group 1 storage vessel at an existing affected source shall be equipped with a closed vent system that reduces organic HAP emissions by 95% by weight or greater. Tank is controlled with Emission Point 4-91 (CATV) - NESHAPS Pesticide Active Ingredient Production -Storage Vessels. [40 CFR 63.1362(c)(2)(iv)(A)]

EQT072 2414-F: Triazine Effluent Surge Tank

93 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. MACT is not required. Emits Class III TAPs. [LAC 33:III.5109.A]

94 Shall comply with all applicable provisions of 40 CFR 63, Subpart MMM - National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAI MACT). [40 CFR 63.5Subpart(MMM)]

EQT142 125-FB: Atrazine Stump Water Recycle Tank

95 Shall comply with all applicable provisions of LAC 33:III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

EQT143 617-F: Surge Trim Tank

96 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT144 618-F: Ball Mill Feed Tank

97 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT145 621-F: Liquid Triazine Feed Tank

98 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT146 631-F: Liquid Triazine Feed Tank

99 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT147 608-F: Assay Trim Tank

100 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT148 612-F: Liquid Triazine Receiver Tank

101 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

EQT149 615-F: Slurry Receiver Tank

102 Shall comply with all applicable provisions of LAC 33.III.Chapter 51. Ethylene Glycol and Toluene are Class III TAPs; therefore, MACT is not required. [LAC 33.III.5109.A]

FUG003 HPFFUG: Fugitive Emissions

103 Repair according to LAC 33.III.2122.C.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration, except those covered under LAC 33.III.2122.C.1.d. [LAC 33.III.2122.C.1.c]

104 Pumps and valves in heavy liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 5 days if observed leaking by sight, sound, or smell. Repair according to LAC 33.III.2122.C.3 if the pump or valve is determined to be leaking in excess of the applicable limits given in LAC 33.III.2122.C.1.d] Which Months: All Year Statistical Basis: None specified

105 Do not locate any valve, except safety pressure relief valves, at the end of a pipe or line containing volatile organic compounds unless the end of such line is sealed with a second valve, a blind flange, a plug, or a cap. Remove such sealing devices only when the line is in use, for example, when a sample is being taken. When the line has been used and is subsequently resealed, close the upstream valve first, followed by the sealing device. [LAC 33.III.2122.C.2]

106 Make every reasonable effort to repair a leaking component, as described in LAC 33.III.2122, within 15 days, except as provided. [LAC 33.III.2122.C.3]

107 Determine the percent of leaking components at a process unit for a test period using the equation in LAC 33.III.2122.C.4. [LAC 33.III.2122.C.4]

108 Determine the total percent of leaking and unrepairable components using the equation in LAC 33.III.2122.C.5. [LAC 33.III.2122.C.5]

109 Process drains: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21, annually (one time per year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33.III.2122.C.3. [LAC 33.III.2122.D.1.a] Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

FUG003 HPFFUG: Fugitive Emissions

- 110 Compressor seals: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. [LAC 33:III.2122.D.1.b.i]
- Which Months: All Year Statistical Basis: None specified
- 111 Pressure relief valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. [LAC 33:III.2122.D.1.b.ii]
- Which Months: All Year Statistical Basis: None specified
- 112 Valves in liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions). [LAC 33:III.2122.D.1.b.iii]
- Which Months: All Year Statistical Basis: None specified
- 113 Pumps in liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. [LAC 33:III.2122.D.1.b.iv]
- Which Months: All Year Statistical Basis: None specified
- 114 Valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions). [LAC 33:III.2122.D.1.b.v]
- Which Months: All Year Statistical Basis: None specified
- 115 Pumps: Seal or closure mechanism monitored by visual inspection/determination weekly (32 times a year). [LAC 33:III.2122.D.1.c]
- Which Months: All Year Statistical Basis: None specified
- 116 Flanged connectors: Presence of a leak monitored by visual, audible, and/or olfactory weekly. [LAC 33:III.2122.D.1.d.i]
- Which Months: All Year Statistical Basis: None specified
- 117 Flanged connectors: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly. [LAC 33:III.2122.D.1.d.j]
- Which Months: All Year Statistical Basis: None specified
- 118 Instrumentation systems: Presence of a leak monitored by visual, audible, and/or olfactory weekly. [LAC 33:III.2122.D.1.e]
- Which Months: All Year Statistical Basis: None specified
- 119 Pressure relief valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 24 hours after venting to the atmosphere. If a reading of 1,000 ppmv or greater (for petroleum refineries, SOCM1, MTBE, and polymer manufacturing industry) or 2,500 ppmv or greater (for natural gas processing plants) is detected, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. [LAC 33:III.2122.D.3.a]
- Which Months: All Year Statistical Basis: None specified
- 120 All components: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21, upon each occurrence of a leak detected by sight, smell, or sound, unless electing to implement actions as specified in LAC 33:III.2122.C.3. [LAC 33:III.2122.D.3.b]
- Which Months: All Year Statistical Basis: None specified
- 121 Inaccessible valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (at a minimum). [LAC 33:III.2122.D.3.c]
- Which Months: All Year Statistical Basis: None specified
- 122 Unsafe-to-monitor valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of conditions allowing these valves to be monitored safely. [LAC 33:III.2122.D.3.d]
- Which Months: All Year Statistical Basis: None specified
- 123 When a component which has a leak that cannot be repaired, as described in LAC 33:III.2122.C, is located, affix to the leaking component a weatherproof and readily visible tag bearing an identification number and the date the leak is located. Remove the tag after the leak has been repaired. [LAC 33:III.2122.F.1]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

FUG003 HPFFUG: Fugitive Emissions

- 124 Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified in LAC 33:III.2122.F.2.a through j. Retain the survey log for two years after the latter date specified in LAC 33:III.2122.F.2 and make said log available to DEQ upon request. [LAC 33:III.2122.F]
- 125 Submit report Due semiannually, by the 31st of January and July, to the Office of Environmental Assessment, Environmental Technology Division. Include the information specified in LAC 33:III.2122.G.1 through 6 for each calendar quarter during the reporting period. [LAC 33:III.2122.G]
- 126 Shall comply with all applicable provisions of 40 CFR 63 Subpart MMM - NESHAPS Pesticide Active Ingredient Production. [40 CFR 63.1363]

GRP027 Herbicide Production Facility

- 127 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1103]
- 128 Outdoor burning of waste material or other combustible material is prohibited. [LAC 33:III.1109.B]
- 129 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]
- 130 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 131 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 132 Biphenyl <= 0.004 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 133 Carbon monoxide <= 59.13 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 134 Hydrogen cyanide <= 0.26 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 135 Particulate matter (10 microns or less) <= 14.70 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 136 Phosgene <= 0.03 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 137 Sulfur dioxide <= 0.20 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 138 Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HR VOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. [LAC 33:III.501.C.6]
- 139 Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. [LAC 33:III.501.C.6]
- 140 VOC, Total <= 276.86 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 141 Carbon tetrachloride <= 45.81 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1.

Air - Title V Regular Permit Minor Mod

RP027 Herbicide Production Facility

- 142 Chlorine <= 1.15 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 143 Chloroform <= 0.05 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 144 Hydrochloric acid <= 2.92 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 145 Toluene <= 190.93 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 146 Nitrogen oxides <= 55.96 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 147 Benzene <= 0.01 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 148 Ethylene glycol <= 0.03 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 149 Methanol <= 0.41 tons/yr. [LAC 33:III.501.C.6]
Which Months: Phases: Statistical Basis: Annual maximum
- 150 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]
- 151 Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 152 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 153 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A. [LAC 33:III.5105.A.4]
- 154 Submit initial annual emissions report (TEDI) to DEQ within 180 days of December 20, 1991. Identify the quantity of emissions of toxic air pollutants listed in Table 51.1 for the calendar year 1991. [LAC 33:III.5107.A.1]
- 155 Submit Annual Emissions Report (TEDI): Due annually, by the 1st of July, to the Office of Environmental Assessment, Environmental Evaluation Division in a form specified by the department. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 156 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]
- 157 Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

GRP027 Herbicide Production Facility

- 158 Submit notification: Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.Chapter 51.Table 51.1 or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.2]
- 159 Submit notification: Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.3]
- 160 Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii. [LAC 33:III.5107.B.4]
- 161 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]
- 162 Submit to DEQ a certification of compliance with all MACT requirements, in accordance with LAC 33:III.5109.D. Include the elements listed in LAC 33:III.5109.E
(Compliance Plan submitted on 3/20/1995). [LAC 33:III.5109.A.2]
- 163 Permittee shall comply with all applicable requirements of LAC 33:III.Chapter 51. For sources that emit Class III pollutants, no controls are required. [LAC 33:III.5109.A]
- 164 Submit to DEQ a certification of compliance with all ambient air standards, in accordance with LAC 33:III.5109.D. Include the elements listed under LAC 33:III.5109.E. [LAC 33:III.5109.B.2]
- 165 Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 166 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2. [LAC 33:III.5109.B]
- 167 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 168 Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:III.1701, before commencement of the construction of any new source. [LAC 33:III.5111.A.1]
- 169 Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source. [LAC 33:III.5111.A.2.a]
- 170 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A]
- 171 Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel. [LAC 33:III.5113.B.1]
- 172 Emission tests shall be conducted as set forth in accordance with Test Methods of 40 CFR, Parts 60, 61, and 63 or in accordance with alternative test methods approved by the administrative authority. [LAC 33:III.5113.B.2]
- 173 Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department. [LAC 33:III.5113.B.3]
- 174 Provide emission testing facilities as specified in LAC 33:III.5113.B.4 through e. [LAC 33:III.5113.B.4]

SPECIFIC REQUIREMENTS

AID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

3RP027 Herbicide Production Facility

- 175 Analyze samples and determine emissions within 30 days after each emission test has been completed. [LAC 33:III.5113.B.5]
- 176 Submit certified letter: Due to the Office of Environmental Assessment, Environmental Technology Division before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test. [LAC 33:III.5113.B.5]
- 177 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 178 Retain records of emission test results and other data needed to determine emissions. Such records shall be retained at the source, or at an alternate location approved by DEQ for a minimum of two years, and shall be made available upon request for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.5113.B.6]
- 179 Submit notification: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test. [LAC 33:III.5113.B.7]
- 180 Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence. [LAC 33:III.5113.C.1]
- 181 Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ. [LAC 33:III.5113.C.2]
- 182 Submit performance evaluation report: Due to the Office of Environmental Assessment, Environmental Technology Division within 60 days of the monitoring system performance evaluation. [LAC 33:III.5113.C.2]
- 183 Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin. [LAC 33:III.5113.C.2]
- 184 Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems. [LAC 33:III.5113.C.3]
- 185 Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days. [LAC 33:III.5113.C.5.a]
- 186 Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, Appendix B. [LAC 33:III.5113.C.5.a]
- 187 Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS. [LAC 33:III.5113.C.5.d]
- 188 Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS. [LAC 33:III.5113.C.5.e]
- 189 Submit plan: Due to the Office of Environmental Assessment, Environmental Technology Division within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system. [LAC 33:III.5113.C.5]
- 190 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ. [LAC 33:III.5113.C.7]
- 191 All affected facilities shall comply with all applicable provisions in LAC 33:5151.Subchapter M. [LAC 33:III.5901.]
- 192 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.A.]

SPECIFIC REQUIREMENTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

R027 Herbicide Production Facility

- 193 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur. [LAC 33:III.5907]
- 194 Submit Emission Inventory (E)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Environmental Evaluation Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 195 Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:1, Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:1.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases. [LAC 33:III.927]
- 196 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart M. [40 CFR 61]
- 197 Shall comply with all applicable provisions of 40 CFR 63 Subpart MMM Pesticide Active Ingredient Production. [40 CFR 63.1360]
- 198 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 199 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 200 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	PM ₁₀			SO ₂			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 033 001	- 3.20	3.60	12.90	0.04	0.04	0.17	10.60	11.70	42.70	13.50	13.80	54.40	1.29	1.50	5.49
EQT 034 002															
EQT 035 002b	0.03	0.04	0.13	0.002	0.003	0.01	2.20	2.64	9.64	0.22	0.26	0.96	0.003	0.01	0.01
EQT 036 003	0.33	1.30	1.44												
EQT 037 010	0.09	0.10	0.01	0.01	0.01	0.01	1.73	1.91	1.74	0.43	0.48	0.43	0.07	0.08	0.08
EQT 038 011	0.003	0.003	0.01	0.001	0.001	0.004	0.09	0.09	0.4	0.47	0.47	2.1	0.08	0.10	0.36
EQT 040 013	0.003	0.003	0.01										4.61	5.53	20.20
EQT 042 2110F															
EQT 043 2112F															
EQT 044 119F															
EQT 045 2117FA															
EQT 046 2119F															
EQT 047 2120F															
EQT 048 1-03	0.03	0.03	0.11	0.002	0.002	0.01	0.34	0.40	1.48	0.28	0.34	1.24	0.10	0.34	0.42
EQT 050 105F													0.002	0.002	0.001
EQT 051 132FA													0.02	0.03	0.003
EQT 052 132FB													0.02	0.03	0.003
EQT 053 133F													0.01	0.01	0.001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	PM ₁₀			SO ₂			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 054 134-F													0.01	0.01	0.001
EQT 055 158-F													0.01	0.01	0.001
EQT 056 168-F													0.01	0.01	0.001
EQT 058 4-91													0.96	1.15	4.21
EQT 059 130-FA													1.57	1.88	0.19
EQT 060 130-FB													1.57	1.88	0.19
EQT 061 138-F													0.81	0.97	0.10
EQT 062 140-F													0.81	0.97	0.10
EQT 072 2414-F													0.01	0.01	0.001
EQT 142 125-FB													0.001	0.001	0.001
EQT 143 617-F													0.001	0.001	0.001
EQT 144 618-F													0.001	0.001	0.001
EQT 145 621-F													0.001	0.001	0.001
EQT 146 631-F													0.001	0.001	0.001
EQT 147 608-F													0.001	0.001	0.001
EQT 148 612-F													0.001	0.001	0.001
EQT 149 615-F													0.001	0.001	0.001
FUG 003 HPFFUG													55.82	55.82	244.59

EMISSION RATES FOR CRITERIA POLLUTANTS

AJ ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Phase Totals:

PM10:	14.70 tons/yr
SO2:	0.20 tons/yr
NOx	55.96 tons/yr
CO:	59.13 tons/yr
VOC:	276.86 tons/yr

Emission rates Notes:

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-VI

Air - Title V Regular Permit Minor Mod

All phases

		Benzene		Biphenyl		Carbon tetrachloride		Chlorine		Chloroform	
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr
EQT 033 001	0.001	0.001	0.001								
EQT 034 002						0.18	34.13	0.80	0.25	23.53	1.09
EQT 035 002b	0.001	0.001	0.001			0.003	0.012	0.014	0.014	0.063	0.001
EQT 037 010	0.001	0.001	0.001								
EQT 038 011	0.001	0.001	0.001								
EQT 040 013											
EQT 043 2112F											
EQT 044 119F											
EQT 046 2119F											
EQT 048 1-03	0.001	0.001	0.001			0.001	0.004				
EQT 050 105F											
EQT 051 132-FA											
EQT 052 132-FB											
EQT 053 133-F											
EQT 054 134-F											
EQT 055 156-F											
EQT 056 168-F											
EQT 058 491											

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

All phases										Methanol			Phosgene		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Tons/Year
EQT 033 001										0.08	0.13	0.34			
EQT 034 002				0.05	0.30	0.20						0.01	0.12		0.03
EQT 035 062b				0.49	0.239	0.824				0.005	0.007	0.02	0.001	0.001	0.001
EQT 037 010				0.24	0.24	0.57				0.01	0.02	0.02			
EQT 038 011							0.06	0.09	0.26	0.002	0.002	0.01			
EQT 040 013															
EQT 043 2112F	0.002	0.002	0.01												
EQT 044 118F															
EQT 046 2119F	0.002	0.002	0.01												
EQT 048 1-43							0.19	0.23	0.83			0.004	0.006	0.02	
EQT 050 105F															
EQT 051 132-F															
EQT 052 132-FB															
EQT 053 133-F															
EQT 054 134-F															
EQT 055 156-F															
EQT 056 168-F															
EQT 058 4-91							0.20	0.40	0.88						

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc. - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Toluene				
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	
EQT 033 001	0.82	0.99	3.60	
EQT 034 002				
EQT 035 002b				
EQT 037 010				
EQT 038 011				
EQT 040 013	4.61	5.53	20.20	
EQT 043 2112F				
EQT 044 119F				
EQT 046 2119F				
EQT 048 1-03	0.06	0.27	0.27	
EQT 050 105-F	0.002	0.002	0.001	
EQT 051 132-F-A	0.02	0.03	0.003	
EQT 052 132-F-B	0.02	0.03	0.003	
EQT 053 133-F	0.01	0.01	0.001	
EQT 054 134-F	0.01	0.01	0.001	
EQT 055 156-F	0.01	0.01	0.001	
EQT 056 168-F	0.01	0.01	0.001	
EQT 058 4-91	0.96	1.15	4.21	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER20060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	Benzene			Biphenyl			Carbon tetrachloride			Chlorine			Chloroform		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 059 130-F4															
EQT 060 130-FB															
EQT 061 136-F															
EQT 062 140-F															
EQT 072 2414-F															
EQT 142 125-FB															
EQT 143 617-F															
EQT 144 618-F															
EQT 145 621-F															
EQT 146 631-F															
EQT 147 608-F															
EQT 148 612-F															
EQT 149 615-F															
FUG 003 HPFFUG										10.28	10.28	45.0			

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 2367 - Syngenta Crop Protection Inc - St Gabriel Plant

Activity Number: PER200060002

Permit Number: 2904-V1

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	Ethylene glycol			Hydrochloric acid			Hydrogen cyanide			Methanol			Phosgene		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 059 130-F				0.10	0.20	0.07									
EQT 060 130-FB				0.10	0.20	0.07									
EQT 061 136-F															
EQT 062 140-F															
EQT 072 2414-F															
EQT 142 125-FB	0.001	0.001	0.001												
EQT 143 617-F	0.001	0.001	0.001												
EQT 144 618-F	0.001	0.001	0.001												
EQT 145 621-F	0.001	0.001	0.001												
EQT 146 631-F	0.001	0.001	0.001												
EQT 147 608-F	0.001	0.001	0.001												
EQT 148 612-F	0.001	0.001	0.001												
EQT 149 615-F	0.001	0.001	0.001												
FUG 003 HPFFUG															